UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

Rooterman, LLC,

Plaintiff,

v.

Klodian Belegu, Quality Air Care Corporation, RM Water Damage Restoration LTD and 911 Sewer & Drain Corporation.

Defendants.

Civil Action No. 1:24-cv-13015

DECLARATION OF CASSIDY FLAVIN

- I, Cassidy Flavin, hereby declare:
- 1. I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I have knowledge of the facts set forth herein, and if called as a witness, could and would testify competently thereto.
- 2. I am a Paralegal at Randazza Legal Group, PLLC, counsel for Defendants in the above-captioned matter. I make this declaration in support of Defendants' Opposition to Plaintiff's Revised Motion for a Preliminary Injunction (the "opposition").
- 3. On January 13, 2025, I used the USPTO Trademark Search system to view the Registration Certificates of the trademarks listed in Exhibit B to the Complaint (ECF No. 1-2).
- 4. A true and correct copy of those Registration Certificates are filed herewith as Composite **Exhibit 11**.
- 5. On January 13, 2025, I used the USPTO Trademark Search system to view the status of an application for a word mark in "Rooterman", Serial No. 73456290.
- 6. A true and correct copy of the "status" page for Serial No. 73456290 is attached hereto as **Exhibit 12**.

- On January 13, 2025, I used the USPTO Trademark Search system to view the 7. Office Action for word mark "ROOTER MAN", Serial No. 3859654.
- A true and correct copy of the Office Action for Serial No. 3859654 is attached 8. hereto as **Exhibit 13**.
- On January 13, 2025, I used the USPTO Trademark Search system to view the 9. Nonfinal Office Action for mark "911 SEWER & DRAIN", Serial No. 97346878.
- 10. A true and correct copy of the Nonfinal Office Action for Serial No. 97346878 is attached hereto as Exhibit 14.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Jan. 13, 2025

By: Cassidy Flavin